



# INTERNAL AUDIT REPORT

## SCHOOL SAFETY



April 6, 2004

Roanoke City School Board Audit Committee  
Roanoke, Virginia

We have completed an audit of the school safety. We performed this audit in accordance with generally accepted government auditing standards.

### **BACKGROUND**

According to Section 22.1-279.8 of the Code of Virginia, a safety audit is defined as a written assessment of the safety conditions in each school to (i) identify and, if necessary, develop solutions for physical safety concerns, including building security issues and (ii) identify and evaluate any patterns of student safety concerns occurring on school property or at school-sponsored events.

In 1997, the Virginia Department of Education developed a "list" to guide schools in completing safety audits, as required under 22.1-279.8. In June 2000, the Virginia Department of Education published the revised "School Safety Audit Protocol" to take the place of the original list and to better guide school districts in the audit process. The School Safety Audit Protocol provided a comprehensive methodology for conducting safety audits of individual schools and included check lists, questionnaires, and a recommended structure for safety audit teams to conduct the audits. The Protocol recommended that safety audit teams have from three (3) to six (6) members who are stakeholders such as administrators, teachers, parents, maintenance staff, law enforcement, school nurses, etc. However, the Protocol recommended that none of the audit team members be from the school under audit in order to ensure neutrality and objectivity. Roanoke City School Board policy EB (August 13, 2002 revision) requires each school within the Roanoke City Public School division to conduct an annual school safety audit using the "item-list" developed by the Superintendent of Public Instruction, which has, in effect, been the School Safety Audit Protocol since June 2000.

The Code of Virginia, section 22.1-279.3:1 "Reports of certain acts to school authorities," requires specific incidents to be reported by school principals to both the Virginia Department of Education and the local police. The incidents that must be reported to local police are as follows:

- Assault and battery which results in bodily injury, sexual assault, death, shooting, stabbing, cutting, or wounding of any person on a school bus, on

school property, or at a school sponsored activity.

- Any conduct involving alcohol, marijuana, a controlled substance, imitation controlled substance, or an anabolic steroid on a school bus, on school property, or at a school sponsored activity, including the theft or attempted theft of student prescription medications.
- Any threats against school personnel while on a school bus, on school property, or at a school sponsored activity.
- The illegal carrying of a firearm onto school property.
- Any illegal conduct involving firebombs, explosive materials or devices, hoax explosive devices, explosive or incendiary devices, or chemical bombs on a school bus, on school property, or at a school sponsored activity.
- Any threats or false threats to bomb, made against school personnel or involving school property or school buses.

Section 22.1-279.3 of the Code of Virginia also authorizes local police departments to report certain crimes committed by students enrolled at a school to the principal, regardless of where the crimes are committed. If the police report the crimes to the school, the law requires the school to record the incidents and to include them in the school's discipline, crime, and violence report to the Virginia Department of Education.

Roanoke City School Board policy JFC also summarizes unlawful acts that require police notification, such as assault/battery, theft, and bomb threats. Policy KNAJ requires that principals or their designees promptly report to local law enforcement officials all incidents occurring on school property involving such things as assault, assault and battery, sexual assault, shooting, any conduct involving alcohol, controlled substances, threats against school personnel, and the illegal carrying of a firearm onto school property.

In our preliminary planning, we found that the Police department's incident-based reporting system, LRMS, had a number of data entry and data validation issues that would prevent us from being able to rely on the data. As an alternative, we identified the computer-aided dispatch system (CAD) in the E-911 Dispatch Center that has a much higher degree of data reliability but more limited data. The CAD system uses generic descriptions for incidents that encompass several separate offense codes used by the schools.

## **PURPOSE**

This audit was added to the 2004 audit plan after the public and school administration became concerned about discipline, crime, and violence in the school division and the accuracy of related data reported by the Division to the

Virginia Department of Education. The audit was designed to look at historical data in order to provide some insight into what had occurred. It was not designed to evaluate current processes that have been evolving since June 2003 as efforts have been made to improve data accuracy and ensure compliance with local and state requirements. The specific objectives of the audit were as follows:

- To determine if each school had completed an individual building level assessment of safety, in accordance with State code section 22.1-279.8.
- To determine if each school had completed a crisis and emergency management plan as required by State code section 22.1-279.8.
- To compare the historical discipline, crime, and violence data recorded by the school system with the data recorded by the Roanoke City Police department, on a sample basis, in order to determine if incidents have been reported as required by State code and Board policy.

### **SCOPE**

The audit focused on safety audits completed by all schools in the Roanoke City Public School division between July 1, 1998 and December 31, 2003. We also reviewed current crisis and emergency management plans on file in Student Services as of December 31, 2003. We evaluated the discipline, crime, and violence data recorded by the Roanoke City Public School division and the Roanoke City Police department between July 1, 2001 and June 30, 2003.

### **METHODOLOGY**

In planning the audit, we extensively reviewed the publications issued by the Virginia Department of Education addressing the requirements for reporting discipline, crime, and violence data, and addressing the protocol for assessing safety in individual schools. We also reviewed related laws and regulations adopted by the Roanoke City School Board and the State of Virginia. We spoke with a number of people from both the schools and the Roanoke City Police department regarding their systems and data. Based on the information we gathered in this phase of the audit, we were able to set our objectives for test work.

We determined in the planning phase that safety audits were not completed according to the requirements of the School Board and State law. In the testing phase of our audit, we attempted to determine why the required safety audits were not performed. We did this by interviewing former and current employees, by reviewing all historical correspondence from the Student Services department, by reviewing the minutes from the Safety Advisory Committee meetings, and by reviewing any working papers given to, or produced by, the Safety Advisory Committee. We also contacted the Department of Education

and asked for copies of all certifications received from the City of Roanoke regarding completion of required safety audits.

In planning the audit, we noted that a school crisis and emergency management plan was required by law for each school and that such plans were an important component of a school's overall process for creating a safe environment. In the testing phase of the audit, we reviewed every school crisis and emergency management plan on file and evaluated each against the required components as set out in section 22.1-279.8 of the Code of Virginia.

Due to the limited commonalities between the police and school data, we had to sort and filter the data in a number of ways in order to produce targeted samples of incidents. We judgmentally selected incidents recorded on the School Division's student information system (Pentamation) that, based on the offense codes used, appeared to require the schools to report the incidents to the Police in accordance with the Code of Virginia §22.1-279.3:1. These were incidents such as assault and battery, weapons possession, bomb threats, and threats against school personnel. We then reviewed the detailed descriptions of the incidents as recorded in the Pentamation system and determined if the nature of the offense required reporting to police and whether or not officers were involved. If the incident should have been reported and officer involvement was not noted, we searched the police data again using the more detailed data in order to ensure we had not overlooked the incident.

Similarly, we analyzed the data from the computer aided dispatch system and selected a targeted sample of incidents that appeared to require reporting by the School Division to the Virginia Department of Education. We then searched the Pentamation system for matching incidents based on dates, location, and offense codes. Those incidents without a match on the Pentamation system were selected for detailed review. We obtained copies of the original police reports to review and to determine the range of possible offense codes the schools might have used. We then reviewed the Pentamation records again, using the information from the police reports, to ensure we had not overlooked the entry on Pentamation. We then visited the schools where the incidents occurred and reviewed the police reports with the Principals, Assistant Principals, and Officers. We asked for any paper records showing the incidents were referred for entry, and we asked for any rationale the schools had to explain why incidents were not reported in the Pentamation system.

## **RESULTS**

### **Finding 01 – Safety Audits**

We reviewed the available records regarding safety audits conducted in all 31 schools in the Roanoke City Public School District, including Noel C. Taylor and Blue Ridge Technical Academy. The most current records at the time of our audit indicated that safety audits were completed in November and December

of 2000 up through January 2001. Based on the documentation available, we concluded that safety audits have not been performed on an annual basis as required by Roanoke City School Board policy EB.

The safety audits prepared in 2000-01 vary in form and content from school to school but appear to have been undertaken to comply with the requirements to audit safety established by section 22.1-279.8 of the Code of Virginia. In most cases, the audits were performed primarily by school resource officers assigned to the schools, with school staff and parents involved in varying degrees. The approach to the audits was not consistent across the School District. Some schools referenced a process called Crime Prevention Through Environmental Design (CPTED) in their reports. Some schools used portions of the check lists from the Safety Audit Protocol published by the Virginia Department of Education. In all cases, we evaluated the safety audits documented by the Division to be insufficient when compared with the goals and recommended processes detailed in the Safety Audit Protocol. The specific concerns we noted include:

- Persons independent of the school being audited were not used to conduct the safety audit.
- Crisis and Emergency Management plans were not thoroughly considered and reviewed as part of each school's audit.
- Formal interviews using the interview guides from the Protocol were not conducted at any school. One of the stated goals of section 22.1-279.8 is to identify and evaluate patterns of student safety concerns occurring on school property or at school sponsored events. Interviews of students and staff are necessary to achieve this goal.
- There was nothing documented to indicate schools reviewed progress on recommendations annually, as required by the Protocol.

The Student Services department did not have internally documented procedures for administering the safety audit program. A division wide priority such as safety audits requires centralized coordination and monitoring to ensure it is adequately completed. Internal procedures that would address this need might include a standard audit protocol to be followed by all schools, the required make up of audit teams, timelines for completing audits, content requirements for reports, provisions for reviewing reports for final acceptance, and requirements for certifying safety audits with the Department of Education.

At our opening conference with Student Services in December, the Acting Director had already reviewed the safety audits on file and agreed that the process was not adequate. The Acting Director was establishing four safety audit teams to conduct independent safety audits and had adopted the Safety Audit Protocol as the official audit program for the Division.

### **Management Response 01 – Safety Audits**

The safety audit teams have been in place since January 16, 2004, and are following the Safety Audit Protocol to conduct their audits. The teams are interviewing a minimum of four students, four faculty members, and the Principal during each audit. A written summary of each school's strengths, weaknesses, and audit recommendations will be provided to the audited schools by June 1, 2004. We have completed approximately 20 audits to date with all schools due to be completed by April 30, 2004. Appropriate follow up will be conducted and documented.

Internal procedures for administering the safety audit process have been completed and will be followed for the 2004-05 school year.

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### **Finding 02 – Crisis and Emergency Management Plans**

According to Roanoke City School Board policy EB and section 22.1-279.8 of the Code of Virginia, each school should have a crisis and emergency management plan that addresses situations involving: fires, flood, disruption of power / water / communications, bus or other accidents, medical emergencies, student or staff member deaths, explosions, bomb threats, weapons threats, exposures to hazardous substances, trespassers, kidnapping or disappearance of students, and hostage situations. Based on the law, we identified sixteen required components and evaluated each crisis plan on the basis of whether or not it addressed each component.

We found that only one (1) of thirty-one (31) existing crisis and emergency management plans covered all of the required components and that 29 schools covered five or fewer required components in their plans. There was also no single component that was addressed in all plans. For example, plans for managing fire situations were not addressed by seven (7) schools' plans. Only ten (10) schools' plans addressed hostage situations. Crisis and emergency management plans that do not address certain components increase the risks that schools will not address a crisis in a way that minimizes damages, personal injuries, or other adverse effects.

As with safety audits, the Student Services department needs to internally document its procedures for coordinating and monitoring crisis and emergency management planning across the district.

### **Management Response 02 – Crisis and Emergency Management Plans**

Principals were instructed to review and revise plans, starting in January 2004, for the upcoming 2004-05 school year. A check list will be developed based on the results compiled from the "Crisis and Emergency Management Plan" section

from the current safety audit report. This list will be provided to each School Principal in May 2004, as a guide to ensure plans for 2004-05 are consistent and complete throughout the Division.

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### **Finding 03 – Unrecorded Incidents**

The literature published by the Virginia Department of Education specifies that incidents involving any of the Department's defined offense codes must be reported, even if no disciplinary sanction is imposed. Using the computer aided dispatch data from the E-911 Center, we identified offenses reported by police as occurring on school properties from July 1, 2001 through June 30, 2003, that would require reporting to the Virginia Department of Education. Due to the large number of incidents, we selected a sample 134 police incidents and compared them with incidents recorded on the School Division's Pentamation system. Initially, we identified 65 incidents for which we could not find a match and for which we requested the original police reports to review. After reviewing the narrative in the police reports and meeting with school personnel, we confirmed that 29 of these incidents were not recorded in the Pentamation system. Due to the time that had elapsed since some of the incidents had occurred, the absence of paper referrals, and turnover in school staff, we were unable to determine why 13 of the 29 incidents were not recorded. The following is a list of reasons provided for the other 16 incidents:

- Seven (7) incidents were not recorded because the offenders could not be identified and the Schools' procedures at that time did not provide for recording them.
- Three (3) incidents were not recorded because the offenders were not students and the Schools' procedures at that time did not provide for recording them.
- Two (2) incidents were not recorded because the incidents occurred after school hours and the Schools' procedures at that time did not provide for recording them.
- Per the Principal involved, one (1) incident was not recorded because Student Services advised her by phone that the school did not have to record the incident after a teacher first notified the school resource officer and the Principal learned of the incident after the police report was written.
- One (1) incident was not recorded because the Principal was unaware of the sexual offense without force category.
- One (1) incident was not recorded because the offending student immediately transferred out of the school after the incident occurred.

- One (1) incident was not recorded because the Principal assessed the incident as one requiring intervention by Social Services and not as an issue related to discipline.

Incomplete incident data inhibits the ability of administrators to identify and address factors that contribute to the frequency and seriousness of incidents. An incomplete history of a specific student's discipline, crime, and violence incidents increases the risk that proper interventions with a student won't be taken.

Our sample was judgmentally selected and therefore cannot be used to project the number of incidents in total that may not have been properly reported. Definitive conclusions regarding the reasons for under reporting were not possible given the limited documentation available.

### **Management Response 03 - Unrecorded Incidents**

A number of changes have been implemented related to the offense coding used, the monitoring of the data, and the training of staff. Approximately 16 training sessions have occurred with principals and assistant principals regarding the coding process. In addition, the consultant on discipline has visited approximately 15 schools and conducted individual training with staff.

All of the protocols outlined in the Department of Education's publication on Discipline, Crime, and Violence Reporting have been initiated so the final Discipline, Crime, and Violence report due on September 15, 2004, will reflect all incidents occurring on school property at any hour of the day or night, including weekends, holidays, and breaks.

Data has been obtained from the Police department from August 25, 2003, to the present. That data is currently being reviewed on a weekly basis and will be used in the final report. Two sources of data are in the process of being obtained from the Courts and the Police department.

Also, a data review committee has been established to review preliminary data on the quarterly reports to the School Board. This committee serves as an additional "check" to ensure the accuracy of the data. The committee includes parents, school resource officers, and school administrators. The first meeting of this committee was held on March 25, 2004, to establish a mission statement and review the data for the third quarter report to the School Board.

Additionally, a data specialist and a consultant have been working full time on discipline data since the middle of October.

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### Finding 04 – Miscoding Incidents

In our review of incidents documented in Pentamation, we found 31 of 56 incidents judgmentally selected for detailed reviews were not appropriately coded:

- Eleven (11) incidents were coded as “Possession of an Illegal Substance” and were reported to the Department of Education as an alcohol offense. These incidents involved illegal drugs.
- Eight (8) incidents were coded as “Distribution” when they should have been coded as “Disruption.”
- Three (3) incidents were recorded as “Under the Influence” which is an alcohol offense. These incidents involved marijuana and not alcohol.
- Three (3) incidents were recorded with a local code of “Sexual Assault” which is reported to the Department of Education as “Attempted Rape Against a Student.” These were not attempted rapes.
- One (1) incident was coded as “Possession of Paraphernalia” for a student bringing in 9 mm bullets.
- One (1) incident was recorded as “Possession of an Illegal Substance” for cursing and causing a disturbance in the hallway.
- One (1) incident was recorded with a local code of “Soliciting/Buy Sell” and was reported to the Department of Education as a drug violation. This incident involved a student selling candy bars without permission.
- One (1) incident was coded as “Possession of Paraphernalia” for lighting a lighter.
- One (1) incident was coded as “Distribution” for asking other students to sniff toxic markers.
- One (1) incident was coded as “Possession of Paraphernalia” for bringing in dice.

### Management Response 04 - Miscoding Incidents

The adoption of the Department of Education’s coding structure and the training previously described are now in place to address coding incidents. By adopting the Department of Education’s codes, we have eliminated the need for a “crosswalk” and the challenges related to translating our prior codes to those defined by the Department of Education. This has provided a more direct and easier process.

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**Finding 05 – Police Notification**

We identified three incidents (alcohol, threat to staff, and marijuana) in which the Police were not notified of incidents as required by State Code. We found that school personnel did not consider the threat incident to be a viable threat based on the child's young age and designation as emotionally disturbed. We were unable to determine why the Police were not notified for the other two incidents. The School Resource Officers are typically involved in alcohol and marijuana cases.

**Management Response 05 – Police Notification**

Additional training has been provided to school staff, as described earlier. We are also receiving weekly reports from the Police department listing all incidents reported. We are cross checking Pentamation incidents against these weekly reports.

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**Finding 06 – Recording Unknown and Non-Student Incidents**

Literature published by the Virginia Department of Education specifies that schools should report qualifying offenses as incidents even in cases when the identity of the offender is unknown. The student identifier that should be used in these incidents should be "UN" to designate that the offender is unknown. The literature further specifies that incidents involving persons who are not enrolled in a Virginia public school should be entered into the records with a student identifier of "NS" for non-student.

We found that the schools were not recording crimes committed on campuses when the offender was unknown or when the offender was not a student. The result was an incomplete history of discipline, crime, and violence incidents. An incomplete history inhibits the School Administration's ability to identify and address factors that contribute to the frequency and seriousness of incidents. The School Administration took prompt action to correct this issue in January 2004, and the School Division is now entering these types of incidents into the Pentamation system.

**Management Response 06 - Recording Unknown and Non-Student Incidents**

We have met with all principals and other appropriate administrators regarding the requirements to record offenses committed by unknown offenders and by persons that are not students. We have also requested and received police reports for all such incidents occurring on school division campuses from August 25, 2003, and forward. These incidents are being entered into the Pentamation system in order to provide a corrected record for the 2003-04 school year.

**CONCLUSION**

Based on the results of our audit work, we conclude that individual building level assessments of safety were not conducted according to the State's Safety Audit Protocol; that crisis and emergency management plans were not complete; and that discipline, crime, and violence data reported in 2001-02 and 2002-03 school years was not complete and accurate.

The school administration has implemented a number of initiatives expected to address the issues noted in this report. An evaluation of controls in the school safety area is currently scheduled in the audit plan for the 2004-05 school year.

We want to thank all of the members of the Roanoke City Police department and the Roanoke City Public School system for the tremendous assistance and cooperation they provided during this audit.

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